

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Periodic Reporting
(Proposal Four)

Docket No. RM2021-7

CHAIRMAN'S INFORMATION REQUEST NO. 2

(Issued September 1, 2021)

To clarify the Postal Service's petition to consider proposed changes in analytical principles, filed July 22, 2021,¹ comments of the Public Representative, filed August 23, 2021,² and reply comments of the United States Postal Service (USPS), filed August 30, 2021,³ the Postal Service is requested to provide written responses to the following questions. The responses should be provided as soon as they are developed, but no later than September 8, 2021.

1. Please refer to the Petition Attachment, folder "Programs." Please provide all of the data files needed to run all of the programs included in the folder "Programs," including all relevant Time and Attendance Collection System (TACS) datasets and Excel workbooks, as well as all program logs.
2. Please refer to Tables 1 through 4 of the Postal Service Reply Comments. Please provide Excel spreadsheets with live formulas of the presented calculations as well as sources for any hard-coded numbers. In addition, please

¹ Petition of the United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes in Analytical Principles (Proposal Four), July 22, 2021 (Petition). See *also* submitted attached materials in folder "RM2021-7_SPCCS_Attachmnt.zip," July 22, 2021 (Petition Attachment).

² Comments of the Public Representative, August 23, 2021 (PR Comments).

³ Reply Comments of the United States Postal Service Regarding Proposal Four, August 30, 2021 (Postal Service Reply Comments).

provide all necessary calculations, data files, and SAS programs to support your explanations.

3. Please refer to the Petition Attachment, folder "Data," SAS dataset "spccs_z_public_fy20q1oct.sas7bdat" (Proposal Four Dataset). Also, please refer to the PR Comments, which state that "[t]here are select sampled [Special Purpose Carrier Cost System (SPCCS)] carrier-days in the Proposal Four October 2019 SAS dataset that link to a seemingly low number of [Product Tracking and Reporting (PTR)] scans given the amount of TACS workhours for the carrier-day sampled." PR Comments at 6 (footnote omitted). Please explain the reason that there are carrier-days in the Proposal Four Dataset with relatively few PTR scans and high amounts of TACS workhours.
4. Please refer to the Proposal Four Dataset. Also, please refer to the PR Comments, which state that "[h]owever, for other SPCCS sampled carrier-days, the PTR event times period range does not appear to align with the total TACS hours shown for the sampled carrier-day. In these instances, the SPCCS data suggest that not all mail pieces associated with the carrier-day SPR TACS workhours may have been captured, linked or recorded in the PTR dataset. If not, this would undercount the total SPR volume for the sampled carrier-day without some type of adjustment or weighting to account for partial volume sampled/obtained from the PTR scans." *Id.* (footnote omitted).
 - a. Please confirm the incidence of PTR scan observations with PTR event time period ranges that do not align with their corresponding TACS workhour ("op_hrs") values.
 - i. If confirmed, please explain the reasoning for the discrepancy between the event time periods and the TACS workhours. Please also explain whether this discrepancy is indicative of undercounting of mail pieces in the SPCCSS data.

- ii. If not confirmed, please explain.
5. Please refer to the Petition which states that “[a]ll parcel products now have barcodes, either domestic Intelligent Mail package barcode (IMpb) or international customs barcodes[] that provide sufficient information such that the specific product can be identified. Moreover, carriers reliably scan parcels upon delivery.” Proposal Four, Petition at 1. Please also refer to the PR Comments which state that “[i]t would improve transparency if the Postal Service provided more specific information regarding ‘its ability to collect data on mailpieces without a barcode’ and if it explained what, ‘among other things[,]’ it has investigated regarding the SPCCS.” PR Comments at 8.
- a. Please explain the bases, including any quantitative studies, for the Postal Service’s assertion that all parcels now have barcodes that are sufficiently identifying and that carriers reliably scan parcels upon delivery. In your response, please include explanations of any investigations and conclusions from said investigations pertaining to whether city carriers were clocked into the correct labor distribution code.
 - b. Please detail any other investigations and conclusions of said investigations conducted by the Postal Service relating to its ability to transition to the SPCCS.
6. Please refer to the Petition Attachment, folder “Workbooks,” Excel file “I_FORMS-Public-FY20-SPCCS.xlsx” (I-FORMS workbook). Please provide all necessary inputs, including “Temp_SPRPTR_Output_FY20_Q4YTD_V17.xlsx,” and note their sources, for the I-FORMS workbook.

By the Chairman.

Michael Kubayanda